

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

GENERAL ACCESS SOLUTIONS, LTD.,

Plaintiff,

v.

CELLCO PARTNERSHIP D/B/A VERIZON  
WIRELESS, VERIZON SERVICES CORP.,  
VERIZON BUSINESS GLOBAL LLC,  
VERIZON BUSINESS NETWORK SERVICES  
LLC, VERIZON CORPORATE SERVICES  
GROUP INC., VERIZON DATA SERVICES  
LLC, and VERIZON ONLINE LLC,

Defendants,

ERICSSON INC.,

Intervenor-Defendant..

Case No. 2:22-cv-00394-JRG

**P.R. 4-5(d) JOINT CLAIM CONSTRUCTION CHART**

Pursuant to P.R. 4-5(d) and the Amended Docket Control Order, Plaintiff General Access Solutions, Ltd. (“General Access”) and Defendants Cellco Partnership d/b/a Verizon Wireless, Verizon Services Corp., Verizon Business Global LLC, Verizon Business Network Services LLC, Verizon Corporate Services Group Inc., Verizon Data Services LLC, and Verizon Online LLC (collectively, “Verizon”) and Intervenor-Defendant Ericsson Inc. (“Ericsson”) hereby serve this joint claim construction chart.

The claim construction chart attached as **Exhibit A** shows the disputed claim terms with separate columns for each party’s proposed construction. The claim terms are found in U.S. Patent No. 7,230,931 (“the ’931 Patent”) and U.S. Patent No. 9,426,794 (“the ’794 Patent”), which are

asserted against Verizon. In addition, with respect to the preambles of the asserted claims of the '931 Patent, the parties have reached the following agreements:

- the parties do not dispute the preambles of claims 1, 19, 28, and 29 are limiting in their entirety;
- the parties do not dispute that with respect to “a transceiver...” recited in the preamble of claim 1, “a” means “one or more”;
- the parties do not dispute that with respect to “base stations capable of bidirectional time division duplex (TDD) communication with wireless access devices disposed at a plurality of subscriber premises...” recited in the preamble of claim 1 (and for the corresponding language recited in the preamble of claim 19), the language only requires that the base stations be capable of communicating with those recited wireless access devices but it does not require that they actually do so.

Dated: November 29, 2023

Respectfully submitted,

/s/ Glen E. Summers by perm. Andrea L. Fair

Glen E. Summers (CO Bar No. 30635)

LEAD ATTORNEY

Nosson D. Knobloch (CO Bar No. 42134)

Sten A. Jernudd (CO Bar No. 58402)

Giovanni Sanchez\* (DC Bar No. 1672009)

\*Not yet admitted to practice in Colorado

BARTLIT BECK LLP

1801 Wewatta Street, Suite 1200

Denver, CO 80202

Telephone: (303) 592-3100

glen.summers@bartlitbeck.com

nosson.knobloch@bartlitbeck.com

sten.jernudd@bartlitbeck.com

giovanni.sanchez@bartlitbeck.com

Michael J. Valaik (IL Bar No. 6276086)

BARTLIT BECK LLP

54 West Hubbard Street, Suite 300

Chicago, IL 60654

Telephone: (312) 494-4400

michael.valaik@bartlitbeck.com

T. John Ward, Jr. (TX Bar No. 00794818)

Charles Everingham IV (TX Bar No. 00787447)

Andrea L. Fair (TX Bar No. 24078488)

WARD, SMITH & HILL, PLLC

1507 Bill Owens Pkwy.

Longview, TX 75604

Telephone: (903) 757-6400

jw@wsfirm.com

ce@wsfirm.com

andrea@wsfirm.com

*Attorneys for Plaintiff General Access Solutions,  
Ltd.*

/s/ Katherine Q. Dominguez by perm. Andrea L. Fair

Katherine Q. Dominguez (NY Bar No. 4741237)

LEAD ATTORNEY

kdominguez@gibsondunn.com

Josh A. Krevitt (NY Bar No. 2568228)

jkrevitt@gibsondunn.com

Brian A. Rosenthal (NY Bar No. 3961380)

broenthal@gibsondunn.com

Sung Bin Lee (NY Bar No. 5701099)

slee3@gibsondunn.com

GIBSON, DUNN & CRUTCHER LLP

200 Park Avenue

New York, NY 10166-0193

Telephone: (212) 351-4000

Jaysen S. Chung (CA Bar No. 280708)

jschung@gibsondunn.com

GIBSON, DUNN & CRUTCHER LLP

555 Mission Street

San Francisco, CA 94105-0921

Telephone: (415) 393-8271

Andrew W. Robb (CA Bar No. 291438)

arobb@gibsondunn.com

GIBSON, DUNN & CRUTCHER LLP

1881 Page Mill Road

Palo Alto, CA 94304

Telephone: (650) 849-5334

Ashbey N. Morgan (TX Bar No. 24106339)

anmorgan@gibsondunn.com

GIBSON, DUNN & CRUTCHER LLP

2001 Ross Avenue, Suite 2100

Dallas, TX 75201

Telephone: (214) 698-3112

Deron R. Dacus (TX Bar No. 00790553)  
ddacus@dacusfirm.com  
THE DACUS FIRM, P.C.  
821 ESE Loop 323, Suite 430  
Tyler, Texas 75701  
Telephone: (903) 705-1117

*Attorneys for Defendants Cellco Partnership d/b/a Verizon Wireless, Verizon Services Corp., Verizon Business Global LLC, Verizon Business Network Services LLC, Verizon Corporate Services Group Inc., Verizon Data Services LLC, and Verizon Online LLC (collectively, "Verizon")*

/s/ Douglas M. Kubehl by perm. Andrea L. Fair

Douglas M. Kubehl (TX Bar No. 00796909)  
doug.kubehl@bakerbotts.com  
Jeffery S. Becker (TX Bar No. 24069354)  
jeff.becker@bakerbotts.com  
Melissa L. Muenks (TX Bar No. 24097442)  
melissa.muenks@bakerbotts.com  
BAKER BOTTS L.L.P.  
2001 Ross Avenue  
Dallas, TX 75201  
Telephone: (214) 953-6500  
Facsimile: (214) 953-6503

*Attorneys for Intervenor-Defendant Ericsson Inc.*

**CERTIFICATE OF SERVICE**

Pursuant to Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that a copy of the foregoing document was filed via the Court's CM/ECF system on November 29, 2023, which will send a notification of such filing to all counsel of record.

/s/ Glen E. Summers by perm. Andrea L. Fair  
Glen S. Summers